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SAN ANTONIO COMMUNITY HOSPITAL 999 SAN BERNARDINO RD UPLAND, CA 91786-4992

Facility ID 14437

Equipment Location: Same

#### ADMINISTRATIVE CHANGE TO P/O's

#### A/N 516182—Admin Change to Trane-Murray Boiler, F58535 (A/N 406908)

BOILER, TRANE-MURRAY, WATER TUBE TYPE, MODEL MCF 2-40, SERIAL NO. 10548, WITH A COEN BURNER, MODEL NO. SDAF-17, 31,400,000 31,000,000 BTU PER HOUR, NATURAL GAS, METHANOL, PROPANE, OR OIL-FIRED, AND A FLUE GAS RECIRCULATION SYSTEM WITH A 15 HP FORCED DRAFT FAN.

#### **Conditions:**

- 1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.

  [RULE 204]
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
  [RULE 204]
- 3. THE AMOUNT OF FLUE GAS RECIRCULATED BACK TO THE BURNER SHALL AUTOMATICALLY REGULATE THE COMBUSTION AIR AND FUEL TO THE BURNER. [RULE 1303(a)(1)-BACT, RULE 1146]
- 4. WHENEVER THE BOILER IS IN OPERATION, THE FLUE GAS RECIRCULATION SHALL BE AUTOMATICALLY REGULATED SO THAT AT LEAST 15% OF THE FLUE GAS SHALL RETURN BACK TO THE BURNER WHEN THE BOILER IS OPERATING AT FULL LOAD.

  [RULE 1303(a)(1)-BACT, RULE 1146]
- 5. THIS BOILER SHALL BE OPERATED IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS OF RULE 1146.
  [RULE 1146]
- 6. ON OR BEFORE JANUARY 1, 2013, THIS BOILER SHALL NOT EMIT MORE THAN 9 PPM
  OF OXIDES OF NITROGEN (NOX), CALCULATED AS NO2, MEASURED BY VOLUME ON A
  DRY BASIS AT 3% O2.
  [RULE 1146]

#### **Periodic Monitoring:**

5. 7. THE OPERATOR SHALL DETERMINE COMPLIANCE WITH THE NOX EMISSION LIMIT(S) BY

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CONDUCTING A TEST AT LEAST ONCE EVERY YEAR USING A PORTABLE ANALYZER AND AQMD-APPROVED TEST METHOD OR, IF NOT AVAILABLE, A NON- AQMD APPROVED TEST METHOD.. THE TEST SHALL BE CONDUCTED WHEN THE EQUIPMENT IS OPERATING UNDER NORMAL CONDITIONS TO DEMONSTRATE COMPLIANCE WITH RULE 1146 CONCENTRATION LIMIT. THE OPERATOR SHALL COMPLY WITH ALL GENERAL TESTING, REPORTING, AND RECORDKEEPING REQUIREMENTS IN SECTIONS E AND K OF THIS PERMIT.

[RULE 3004 (a)(4)]

- 6. 8. THE OPERATOR SHALL DETERMINE COMPLIANCE WITH THE CO EMISSION LIMIT(S) BY CONDUCTING A TEST AT LEAST ONCE EVERY YEAR USING A PORTABLE ANALYZER AND AQMD-APPROVED TEST METHOD OR, IF NOT AVAILABLE, A NON-AQMD APPROVED TEST METHOD. THE TEST SHALL BE CONDUCTED WHEN THE EQUIPMENT IS OPERATING UNDER NORMAL CONDITIONS TO DEMONSTRATE COMPLIANCE WITH RULE 1146 CONCENTRATION LIMIT. THE OPERATOR SHALL COMPLY WITH ALL GENERAL TESTING, REPORTING, AND RECORDKEEPING REQUIREMENTS IN SECTIONS E AND K OF THIS PERMIT.

  [RULE 3004 (a)(4)]
- 7. 9. THE OPERATOR SHALL CONDUCT AN INSPECTION FOR VISIBLE EMISSION FROM ALL STACKS AND OTHER EMISSION POINTS OF THIS EQUIPMENT WHENEVER THIS EQUIPMENT HAS COMBUSTED ONE MILLION GALLONS OF DIESEL FUEL, TO BE COUNTED CUMULATIVELY OVER A FIVE YEAR PERIOD. THE INSPECTION SHALL BE CONDUCTED WHILE THE EQUIPMENT IS IN OPERATION AND DURING DAYLIGHT HOURS. IF ANY VISIBLE EMISSIONS (NOT INCLUDING CONDENSED WATER VAPOR) ARE DETECTED THAT LAST MORE THAN THREE MINUTES IN ANY ONE HOUR, THE OPERATOR SHALL EITHER:

  A. TAKE CORRECTIVE ACTION(S) THAT ELIMINATES THE VISIBLE EMISSIONS WITHIN 24 HOURS AND REPORT THE VISIBLE EMISSIONS AS A POTENTIAL DEVIATION IN THE SAME FASHION AS DEVIATIONS ARE REQUIRED TO BE REPORTED IN SECTION K OF THIS PERMIT; OR
  - B. HAVE A CARB-CERTIFIED SMOKE READER DETERMINE COMPLIANCE WITH THE OPACITY STANDARD, USING EPA METHOD 9 OR THE PROCEDURES IN THE CARB MANUAL "VISIBLE EMISSION EVALUATION", WITHIN THREE BUSINESS DAYS AND REPORT ANY DEVIATIONS TO AQMD.

IN ADDITION, THE OPERATOR SHALL KEEP THE RECORDS IN ACCORDANCE WITH THE RECORDKEEPING REQUIREMENTS IN SECTION K OF THIS PERMIT AND THE FOLLOWING RECORDS:

- A. STACK OR EMISSION POINT IDENTIFICATION;
- B. DESCRIPTION OF ANY CORRECTIVE ACTIONS TAKEN TO ABATE VISIBLE EMISSIONS;
- C. DATE AND TIME VISIBLE EMISSION WAS ABATED; AND
- D. VISIBLE EMISSION OBSERVATION RECORDED BY A CERTIFIED SMOKE READER. [RULE 3004 (a)(4)]

#### **Emissions and Requirements:**

8. 10. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

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CO: 400 PPM, RULE 1146 CO: 2000 PPM, RULE 407 PM: 0.1 GR/SCF, RULE 409

NOx: 30 PPM FOR GASEOUS FUELS, RULE 1146 NOx: 40 PPM FOR NON-GASEOUS FUELS, RULE 1146

A/N 516183—Admin Change to Cleaver-Brooks Boiler, F58537 (A/N 406909)
BOILER CLEAVER BROOKS, WATER TUBE TYPE, MODEL D-34, SERIAL NO. 46017411 WL-3264, 32,000,000 28,375,000 BTU PER HOUR, WITH A CLEAVER BROOKS, MODEL NO. WT 200X-BR-1 BURNER (GAS OR OIL).

#### **Conditions:**

- 1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.

  [RULE 204]
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.

  [RULE 204]
- 3. THE FUEL USAGE OF THIS EQUIPMENT SHALL NOT EXCEED 90,000 THERMS IN ANY CONTINUOUS 12-MONTH PERIOD.
  [RULE 1146]
- 4. A NON-RESETTABLE TOTALIZING FUEL METER FOR EACH FUEL SHALL BE MAINTAINED IN GOOD OPERATING CONDITION FOR THIS EQUIPMENT.
  [RULE 1146]
- 5. THE OPERATOR SHALL MAINTAIN A FUEL USE LOG FOR EACH PRIMARY AND STANDBY FUEL METER WHICH INCLUDES:
  - A) THE PERMIT NUMBER OR APPLICATION NUMBER OF THE BOILER SERVED BY THE PRIMARY AND STANDBY FUEL METERS.
  - B) THE METER READINGS AND MONTHLY FUEL USAGE RECORDED BY THE PRIMARY AND STANDBY FUEL METERS.
  - C) THE TOTAL MONTHLY HEAT INPUT IN BTUS OR THERMS BASED ON THE FUEL USAGES DETERMINED IN B).
  - D) THE TOTAL HEAT INPUT FOR EACH CALENDAR YEAR BASED ON THE MONTHLY HEAT INPUT DETERMINED IN C). [RULE 1146]
- 6. THE EQUIPMENT SHALL COMPLY WITH THE TUNE-UP REQUIREMENTS OF RULE 1146. RECORDS SHALL BE MAINTAINED OF THE DATE OF EACH TUNE-UP, THE COMPANY PERFORMING THE TUNE-UP, AND THE TUNE-UP CO AND O2 RESULTS. [RULE 1146]

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- 7. ALL RECORDS REQUIRED BY THIS PLAN SHALL BE MAINTAINED IN A FORMAT APPROVED BY THE DISTRICT. THE RECORDS SHALL BE KEPT FOR AT LEAST FIVE YEARS AND BE MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.

  [RULE 1146]
- 8. THIS BOILER SHALL BE OPERATED IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS OF RULE 1146.
  [RULE 1146]
- 9. ON OR BEFORE JANUARY 1, 2015, THIS BOILER SHALL NOT EMIT MORE THAN 30 PPM
  OF OXIDES OF NITROGEN (NOX), CALCULATED AS NO2, MEASURED BY VOLUME ON A
  DRY BASIS AT 3% O2.
  [RULE 1146]

#### **Emissions and Requirements:**

8. 10. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

 CO:
 400 PPM, RULE 1146

 CO:
 2000 PPM, RULE 407

 PM:
 0.1 GR/SCF, RULE 409

#### **BACKGROUND**

San Antonio Community Hospital ("SACH") (ID 14437) is a premier acute health care facility that provides a comprehensive range of medical services. The facility is a Title V facility, with the initial Title V facility permit expiring on 10/31/11. The Title V renewal application, A/N 521403, was submitted on 4/14/11.

SACH operates four emergency diesel-fired internal combustion engines (P/O Nos. E1868B, E1867B, E03670, and F15352), three cogeneration systems (P/O Nos. F85020, F85021, and F85022), one spray booth (P/O No. F54693), and two boilers (P/O Nos. F58535, F58537). The three cogeneration systems generate steam for the entire facility. In the event that one of the systems is taken down or additional steam is required, the Trane Murray boiler (F58535) is put into operation. The Cleaver Brooks boiler (F58537) is permitted as a stand-by unit limited to no more than 90,000 therms in a continuous 12-month period.

On 10/26/10, Inspector John Eckert issued Notice to Comply E00016 to require the submittal of administrative change applications to correct equipment description discrepancies, as well as other requirements. Details were provided by Inspector Eckert in an e-mail, dated 10/6/10.

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The applications were submitted by Advanced Environmental Controls ("AEC") on behalf of SACH and are summarized in the table below.

Date	A/N	Prior Permit	Equipment
Submitted		(A/N)	
10/26/10	515682	F85020 (A/N	Cogeneration System No. 1
		457741)	
10/26/10	515685	F85022 (A/N	Cogeneration System No. 2
		457743)	
10/26/10	515684	F15352 (A/N	ICE, Detroit Diesel, 947 bhp, for Emergency
		341088)	Generator
11/9/10	516182	F58535 (A/N	Boiler, Trane-Murray
		406908)	
11/9/10	516183	F58537 (A/N	Boiler, Cleaver-Brooks
		406909)	
3/25/11	520246		Administrative Title V Revision—Converted to
			minor on 5/11/11.

This evaluation is for A/N 515682 and 515683. See separate evaluations for other applications.

#### **ADMINISTRATIVE CHANGES**

- 1. A/N 516182—Trane Murray Boiler, F58535
  - a. <u>Inspector Eckert's Comments re Permit Corrections in e-mail, dated 10/6/10</u> "This boiler's permit has discrepancy, its' plate lists it at 31 MM btu/hr, and it is permitted at 31,400,000 btu / hr. It also has discrepancy with its model # which needs correction."
  - b. Actual Corrections to Permit

AEC confirmed with Coen, the burner manufacturer, that the rating on the plate is not rounded down. Thus the rating will be changed from 31.4 MMBtu/hr to 31 MMBtu/hr. Coen also confirmed that the model no. on the permit, MCF 2-40, is correct.

In addition, the following conditions will be added:

- 1) A permit condition to require compliance with all applicable requirements of Rule 1146.
- A permit condition to require compliance with the 9 ppm NOx limit by 1/1/13.

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#### 2. A/N 516183—Cleaver Brooks Boiler, F58537

a. <u>Inspector Eckert's Comments re Permit Corrections in e-mail, dated 10/6/10</u> "This boiler is rated at 28.375 MM btu / hour and is permitted at 32 MM btu / hour. This boiler also has model and s/n discrepancies. Also missing is NOX emission factor on permit, which should be 30 ppm under Rule 1146. This needs correction"

#### b. Actual Corrections to Permit

The original permit, P/C 129191, describes the boiler as "Boiler, Cleaver Brooks, Water Tube Type, Model D-34, 28.16 MMBtu/hr, State Serial No. WL-3264, with a Cleaver Brooks Bruner, Model 200BR-1, Size 1, Gas or Oil Burner." D64025 (A/N 223777) erroneously modified the burner to a Coen Burner, Model No. SDAF-17, 31.4 MMBtu/hr. The applicant had applied to install the Coen Burner on the Trane Murray boiler instead. The current permit, F58537 (A/N 406909), was issued to correct the equipment description because the Cleaver Brooks boiler had never been modified. The equipment description should have been changed back to the permit description on P/C 129191, but was not.

The current permit, F58537, describes the boiler as "Boiler Cleaver Brooks, Water Tube Type, Model D-34, Serial No. 46017411, 32,000,000 BTU per Hour, with a Cleaver Brooks, Model No. WT 200X-BR-1 Burner (Gas or Oil)." AEC verified with RF McDonald that the Cleaver Brooks burner, model WT 200X-BR-1, is rated at 28.375 MMBtu/hr. Thus, the burner rating will be corrected to 28.375 MMBtu/hr (approximately the same as on P/C 129191). The boiler model no. on the permit, D-34, is correct and verified on the boiler plate. The serial no. will be corrected from 46017411 to WL-3264 (same as on P/C129191). A NOx factor is not required because the boiler is operating under a Rule 1146(c)(3) compliance plan which exempts boilers operating 90,000 therms or less per year from the 30 ppm limit until January 1, 2015, per Rule 1146(e)(3).

In addition, the following permit conditions will be added:

- 1) A permit condition to require compliance with all applicable requirements of Rule 1146.
- A permit condition to require compliance with the 30 ppm NOx limit by 1/1/15.
- 3) A permit condition to limit the CO to 400 ppm.

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#### **EMISSIONS CALCULATIONS**

- 1. A/N 516182—Trane Murray Boiler, F58535
  - a. <u>Prior Emissions, F58535 (application file is missing from Liberty)</u> Operating schedule: 52 wk/yr, 7 days/wk, 24 hr/day

CO = 2.31 lb/hr = 55.44 lb/day NOx = 1.14 lb/hr = 27.36 lb/day PM<sub>10</sub> = 0.23 lb/hr = 5.52 lb/day 30 DA = 55 lb/day 30 DA = 27 lb/day 30 DA = 55 lb/day

ROG = 0.16 lb/hr = 3.84 lb/day 30 DA = 4 lb/day

SOx = 0.02 lb/hr = 0.48 lb/day 30 DA = 0 lb/day

b. <u>A/N 516182—Administrative Change</u>

For this administrative change, emissions will remain the same.

- 2. A/N 516183—Cleaver Brooks Boiler, F58537
  - a. <u>Prior Emissions, F58537</u> (application file is missing from Liberty) Operating schedule: 52 wk/yr, 5 days/wk, 1.08 hr/day

Note: Operating schedule was based on a maximum allowed usage of 90,000 therms/yr. (90,000 therms/yr) (100,000 therms/btu)/32,000,000 btu/hr = 281 hrs/yr.

CO = 2.56 lb/hr = 2.77 lb/day SOX = 3.05 lb/hr = 3.3 lb/day SOX = 0.02 lb/hr = 0.25 lb/day SOX = 0.02 lb/hr = 0.02 lb/hr

Note: The 30-day averages are high because they are incorrectly based on 7 days/wk, instead of the operating schedule of 5 days/wk.

b. A/N 516183—Administrative Change

Operating schedule: 52 wk/yr, 5 days/wk, 1.21 hr/day

Note: Operating schedule based on a maximum allowed usage of 90,000 therms/yr and the corrected 28.375 MMBtu/hr rating. (90,000 therms/yr) (100,000 therms/btu)/28,375,000 btu/hr = 317 hrs/yr.

CO = 2.56 lb/hr = 3.07 lb/day 30 DA = 2.22 lb/day NOx = 3.05 lb/hr = 3.66 lb/day 30 DA = 2.65 lb/day  $PM_{10} = 0.23 \text{ lb/hr} = 0.28 \text{ lb/day}$  30 DA = 0.2 lb/day ROG = 0.17 lb/hr = 0.2 lb/day 30 DA = 0.15 lb/day

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SOx = 0.02 lb/hr = 0.02 lb/day

30 DA = 0.02 lb/day

#### **EVALUATION OF COMPLIANCE WITH MAJOR RULES**

The operation of the boilers, with the administrative corrections to the equipment descriptions, is expected to comply with all applicable SCAQMD rules and regulations as follows:

### Rule 1146—Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters

- Paragraph (a)—This rule is applicable to boilers of equal to or greater than 5 MMBtu/hr rated heat input capacity, including the two boilers under evaluation. Therefore, a permit condition will be added to F58535 and F58537 to require compliance with all applicable requirements of Rule 1146.
- Paragraph (b)(7)-- "Group II Unit" means any unit burning gaseous fuels, excluding digester and landfill gases, with a rated heat input less than 75 million Btu per hour down to and including 20 million Btu per hour..." Both boilers are Group II boilers.
- Subparagraph (c)(1)(A)--All boilers fired on gaseous fuels are required to meet 30 ppm NOx by September 5, 2008. The Trane Murray boiler meets the 30 ppm limit, which is already required by condition no. 8 on F58535.
- Subparagraph (c)(5)(B)—In lieu of complying with the applicable emission limits specified in paragraphs (c)(1), the owner or operator of any unit(s) in operation prior to September 5, 2008 with an annual heat input less than or equal to 90,000 therms per year shall tune the unit at least twice per year. The Cleaver Brooks boiler is operating under a Rule 1146(c)(3) compliance plan approved under A/N 223778 on May 10, 1990. This old compliance plan allowed the Cleaver Brooks boiler to not meet Rule 1146 NOx limits as long as its annual heat input remained less than or equal to 90,000 therms (9.0 x 10<sup>9</sup> Btu/year) and tune-ups requirements are met. Therefore, this boiler is not subject to a NOx limit as indicated on condition no. 8 on F58537.
- Subparagraph (c)(1)(G)--Subparagraph (c)(1)(G) is applicable to Group II units, 75% or more of units (by heat input). These requirements are applicable to the Trane Murray boiler.

Rule Reference	Category	Limit	Submit Compliance Plan on or before	Submit Application for Permit to Construct on or before	Unit Shall be in Full Compliance on or before
(c)(1)(G)	Group II Units 75% or more	9 ppm or 0.011	January 1, 2010	January 1, 2011	January 1, 2012

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of units (by	lbs/10 <sup>6</sup>	
heat input)	Btu	

On 12/18/09, SACH filed A/N 504687, the Rule 1146 Compliance Plan application, for the two boilers at the facility before the compliance deadline of 1/1/10. On 3/5/10, the District approved the compliance plan application based on SACH's proposal that both boilers would meet the requirements of Rule 1146(c)(1)(G). The full compliance date for the two boilers, however, was extended from January 1, 2012, the Rule 1146(c)(1)(G) compliance date, to January 1, 2013, pursuant to Rule 1146(e)(5). Rule 1146(e)(5) allows an extension for medical facilities that have been granted an extension by the Office of Statewide Health Planning and Development to comply with seismic safety requirements.

On 11/17/10, SACH submitted A/N 516275, a compliance plan application to amend the plan approved under A/N 506487. The reason is that the Cleaver Brooks boiler (F58537) is operating under a Rule 1146(c)(3) compliance plan approved under A/N 223778 in May 10, 1990. This old compliance plan allowed the Cleaver Brooks boiler to not meet Rule 1146 NOx limits as long as its annual heat input remained less than or equal to 90,000 therms (9.0 x 10<sup>9</sup> Btu/year). A/N 516275 proposed to remove the Cleaver Brooks boiler from the scheduled burner replacement of January 1, 2013. Instead, the Cleaver Brooks boiler would be retrofitted to meet 30 ppm NOx no later than January 1, 2015, per Rule 1146(e)(3). Paragraph (e)(3) states: "On or after January 1, 2015 or during burner replacement, whichever occurs later, no person shall operate in the District any unit subject to paragraph (c)(5) which does not meet the emissions limits specified in subparagraph (c)(1)(A) of Table 1146-1. As discussed above, subparagraph (c)(1)(A) requires all units fired on gaseous fuels to meet 30 ppm NOx. The amended compliance plan was approved on 1/13/11.

In compliance with the application deadline of 1/1/11, SACH submitted an application to replace the burner on the Trane Murray boiler to meet the impending 9 ppm limit on 12/30/10.

New conditions will be added to the permits for both boilers to require compliance with the impending permit limits. The Trane Murray boiler is required to meet 9 ppm by 1/1/13, and the Cleaver Brooks boiler is required to meet 30 ppm by 1/1/15.

Paragraph (c)(4)—The CO limit is 400 ppmv, corrected to 3% O<sub>2</sub>, for both natural gas and propane. For the Trane Murray boiler, condition no. 8 on F58535 already requires compliance with the 400 ppmv. For the Cleaver Brooks boiler, the 400 ppm limit will be added to condition no. 8 on F58537.

The following provisions govern the source testing requirements:

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Paragraph (d)(6)—Compliance with the NOx emission requirements in paragraph (d)(4) shall be conducted once:

- (A) every three years for units with a rated heat input greater than or equal to 10 million Btu per hour, except for units subject to paragraph (c)(6) (CEMS).
- Paragraph (d)(7)—Provided the emissions test is conducted within the same calendar year as the test required in paragraph (d)(6), an owner or operator may use the following emissions tests to comply with paragraph (d)(6):
  - (A) Periodic monitoring or testing of a unit as required in a title V permit pursuant to Regulation XXX, or .....

For the Trane Murray boiler, condition nos. 5 and 6 on F58535 are periodic monitoring conditions that require using a portable analyzer to determine compliance with NOx and CO at least once every year. On 4/20/11, I consulted Sr. Engineer Hamed Mandilawi of the Coatings Permitting Team regarding whether these conditions have been updated. His team has been leaving these periodic monitoring conditions without any changes on the Title V renewal permits. Accordingly, conditions nos. 5 and 6 will be left on the Trane Murray boiler permit, until the burners are replaced.

- Paragraph (d)(8)—Any owner or operator of units subject to this rule shall check NOx emissions with a portable NOx, CO and oxygen analyzer according to the Protocol for the Periodic Monitoring of Nitrogen Oxides, Carbon Monoxide, and Oxygen from Units Subject to South Coast Air Quality Management District Rules 1146 and 1146.1 according to the following schedule:
  - (A) On or after July 1, 2009, the owner or operator of units subject to paragraph (c)(1) shall check NOx emissions at least monthly or every 750 unit operating hours, whichever occurs later.
- Paragraph (d)(9)—An owner or operator shall opt to comply with the requirements as applied to CO emissions specified in paragraph (d)(8) or subparagraph:
  - (A) (d)(6)(A) for units greater than or equal to 10 mmbtu/hr. Thus, the facility may opt to perform testing with a portable analyzer testing pursuant to Rule

Thus, the facility may opt to perform testing with a portable analyzer testing pursuant to Rule 1146(d)(8), or perform source testing pursuant to (d)(6)(A) or (d)(6)(B), as applicable.

A permit condition will be added to F58535 and F58537 to require compliance with all applicable requirements of Rule 1146.

#### Regulation XIII—New Source Review

- Rule 1303(a)—BACT
- Rule 1303(b)(1)—Modeling
- Rule 1303(b)(2)--Offsets

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BACT, modeling, and offset requirements are not triggered because the administrative corrections will not result in an increase in emissions from either boiler.

#### Regulation XXX—Title V Permits

#### • Rule 3003—Applications

As noted above, this facility is not in the RECLAIM program. The proposed project is considered as a "minor permit revision" to the Title V permit for this facility.

Rule 3000(b)(12)(vi) defines a "minor permit revision" as any Title V permit revision that does not result in an increase in emissions of a pollutant subject to Regulation XIII—New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP).

The proposed project is not expected to result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP), and therefore is considered as a "minor permit revision" pursuant to Rule 3000(b)(12)(A)(vi).

This proposed project will be issued as Revision No. 5 of the Title V facility permit.

#### RECOMMENDATION

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a "minor permit revision," it is exempt from the public participation requirements under Rule 3006(b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised Title V permit will be issued to this facility.